

Ramon Rossi Lopez - rlopez@lopezmchugh.com
(California Bar Number 86361; admitted *pro hac vice*)
Lopez McHugh LLP
100 Bayview Circle, Suite 5600
Newport Beach, California 92660
949-812-5771

Mark S. O'Connor (011029) - mark.oconnor@gknet.com
Gallagher & Kennedy, P.A.
2575 East Camelback Road
Phoenix, Arizona 85016-9225
602-530-8000

Co-Lead/Liaison Counsel for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

In Re Bard IVC Filters Products
Liability Litigation

No. MD-15-02641-PHX-DGC

**NOTICE OF ERRATA AND
PLAINTIFFS' AMENDED NOTICE
OF SERVICE OF DISCLOSURE OF
EXPERT TESTIMONY
(MERIDIAN & DENALI)**

On April 7, 2017, Plaintiffs filed their Notice of Service of Disclosure of Expert Testimony [Doc. #5534]. Plaintiffs' Notice inadvertently failed to include the full list of expert disclosures, including specifically the previously served expert report of Drs. Kinney, Roberts, and Kalva, which is applicable to the Meridian and Denali filters. Plaintiffs provide this errata and amended notice to incorporate that prior disclosure.

Pursuant to Case Management Order 22, Plaintiffs hereby provide notice that they have served on this date the expert reports in accordance with Federal Rule of Civil Procedure 26(a)(2) of the following expert witnesses relating to the Meridian and Denali filters:

Robert M. McMeeking, Ph.D., NAE, FREng, FRSE, LFASME

Robert O. Ritchie, Ph.D.

Suzanne Parisian, M.D.

Robert L. Vogelzang, M.D.

1 *Mark J. Eisenberg, M.D.*

2 Plaintiffs further designate and incorporate the content, substance, and opinions of
3 the following expert witnesses in this MDL previously served on Defendants on March 6,
4 2017:

5 *Thomas Kinney, M.D., M.S.M.E., Anne Christine Roberts, M.D.,*
6 *and Sanjeeva Kalva M.D.*

7 Plaintiffs also further designate and incorporate the content, substance, and opinions
8 of the following expert witnesses in this MDL previously served on Defendants on March
9 3, 2017:

10 *David Garcia, M.D. and Michael B. Streiff, M.D.*

11 *Robert M. McMeeking, Ph.D., NAE, FREng, FRSE, LFASME*

12 *Robert O. Ritchie, Ph.D.*

13 *Suzanne Parisian, M.D.*

14 *Rebecca Betensky, Ph.D.*

15 *David A. Kessler, M.D.*

16 *Robert L. Vogelzang, M.D.*

17 Plaintiffs also further designate and incorporate the content, substance, and opinions
18 of the following expert witnesses in this MDL previously served on Defendants on February
19 10, 2017 in the case of *Barraza, et al. v. C.R. Bard, Inc., et al.* (United States District Court,
20 District of Arizona, class action Case No. 2:16-cv-01374-DGC):

21 *Rebecca Betensky, Ph.D.*

22 *David W. Bates, M.D., MSc*

23 *Steven M. Hertz, M.D.*

24 *Mark J. Eisenberg, M.D.*

25 Finally, Plaintiffs also designate and incorporate the content, substance, and opinions
26 of Dr. David A. Kessler previously served on Defendants on September 27, 2016 in the
27 Circuit Court of the case of *Austin v. C. R. Bard, Inc., et al.* (17th Judicial Circuit, in and for
28 Broward County, Florida, Case No.: CACE-15-008373, Div: 07).

1 Plaintiffs are filing this notice in lieu of filing the original discovery papers pursuant
2 to LRCiv 5.2.

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4 RESPECTFULLY SUBMITTED this 10th day of April, 2017.

5 LOPEZ McHUGH LLP

6 By: /s/ Mark S. O'Connor
7 Ramon Rossi Lopez (CA Bar No. 86361)
8 (admitted *pro hac vice*)
9 100 Bayview Circle, Suite 5600
10 Newport Beach, California 92660

11 GALLAGHER & KENNEDY, P.A.
12 Mark S. O'Connor (011029)
13 2575 East Camelback Road
14 Phoenix, Arizona 85016-9225

15 *Attorneys for Plaintiffs*

16 **CERTIFICATE OF SERVICE**

17 I hereby certify that on this 10th day of April, 2017, I electronically transmitted the
18 attached document to the Clerk's Office using the CM/ECF System for filing and transmittal
19 of a Notice of Electronic Filing.

20 /s/ Deborah Yanazzo
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